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12 *Attorneys for Defendant*  
13 *State Farm Mutual Automobile Insurance Company*

14 **UNITED STATES DISTRICT COURT**  
15 **DISTRICT OF NEVADA**

16 SHALENENA DREW, individually,  
17 Plaintiff,  
18 vs.

Case No.: 2:23-cv-01627

**STIPULATION AND ORDER FOR  
DISMISSAL**

19 STATE FARM MUTUAL AUTOMOBILE  
20 INSURANCE COMPANY, an insurance company,  
21 DOES 1-25 and XYZ Corporations 1-25, inclusive,  
22 respectively,  
23 Defendants.

24 IT IS HEREBY STIPULATED by and between Defendant, STATE FARM MUTUAL  
25 AUTOMOBILE INSURANCE COMPANY through its counsel of record, M. CALEB MEYER, ESQ.  
26 and RENEE M. FINCH, ESQ. of MESSNER REEVES LLP, and Plaintiff SHALENENA DREW,  
27 through her counsel SEAN P. ROSE, ESQ. of ROSE LAW OFFICE, that all claims against STATE  
28 FARM MUTUAL AUTOMOBILE INSURANCE COMPANY arising out of Case No. 2:23-cv-01627  
be dismissed with prejudice in its entirety.

1. Plaintiff filed her Complaint on or about September 15, 2023;
2. This matter reached a resolution prior to Defendant filing an Answer to Plaintiff's Complaint;

1           3.       This matter was removed to this Court on October 9, 2023; the parties mutually agreed to  
2 resolve this action prior to the FRCP 26(f) conference being scheduled;

3           4.       The Parties have been able to reach a mutually acceptable resolution to this matter which  
4 is memorialized in the Settlement and Release Agreement executed contemporaneous hereto;

5           5.       In reaching the resolution STATE FARM MUTUAL AUTOMOBILE INSURANCE  
6 COMPANY does not admit any liability and continues to deny the allegations in the Complaint;  
7 Nonetheless, Plaintiff hereby stipulates to waive any and all claims against Defendant, STATE FARM  
8 MUTUAL AUTOMOBILE INSURANCE COMPANY and dismiss this action with prejudice in  
9 exchange for the agreed to resolution;

10          6.       The parties also hereby stipulate, and this court hereby orders, that this settlement is  
11 deemed a good faith settlement. Therefore, any and all claims by any other party against STATE FARM  
12 MUTUAL AUTOMOBILE INSURANCE COMPANY are hereby extinguished;

13          7.       There is no trial date currently set in this matter;

14          8.       For the above-outlined reasons, the parties hereby stipulate to dismiss the present  
15 litigation, with prejudice;

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Each of the parties to bear their own attorney's fees and costs.

IT IS RESPECTFULLY SUBMITTED.

DATED this 21<sup>ST</sup> day of November, 2023.

MESSNER REEVES, LLP.

/s/ Renee M. Finch

M. Caleb Meyer, Esq.

Nevada Bar No. 13379

Renee M. Finch, Esq.

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8945 W. Russell Rd., Ste. 300

Las Vegas, NV 89148

*Attorneys for Defendant State Farm Mutual  
Automobile Insurance Company*

DATED this 20 day of November, 2023.

ROSE LAW OFFICE

  
Sean P. Rose, Esq.

Nevada Bar No. 5472

150 West Huffaker Lane, Ste. 101

Reno, NV 89511

*Attorney for Plaintiff*

DATED this 20<sup>th</sup> day of November, 2023.

ROSE LAW OFFICE

  
Travis Gerber, Esq.

Nevada Bar No. 8083

Zachary Gerber, Esq.

Nevada Bar No. 13128

491 4<sup>th</sup> Elko

Elko, NV 89801

*Attorney for Plaintiff*

Based on the parties' stipulation and with good cause appearing, this case is dismissed with prejudice with each party to bear its own costs and fees. Plaintiff's motions to remand and change venue [ECF Nos. 5 & 9] are **DENIED as moot** and the hearing set for January 17, 2024, [ECF No. 11] is **VACATED**. The Clerk of Court is directed to **CLOSE THIS CASE**.

IT IS SO ORDERED.

  
United States District Judge

DATED this 21<sup>st</sup> day of November, 2023.